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9 *Attorneys for Defendants,*  
10 *Stephen Fairfax and MTechnology*

11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 SWITCH, LTD.,  
15 a Nevada limited liability company,  
16 Plaintiff,

17 vs.

18 STEPHEN FAIRFAX; MTECHNOLOGY;  
19 DOES 1 through 10; and ROE ENTITIES  
20 11 through 20, inclusive,

21 Defendants.

Case No. 2:17-cv-02651-GMN-VCF

**STIPULATION AND [PROPOSED]  
ORDER TO STAY PROCEEDINGS**

22 IT IS HEREBY STIPULATED and agreed by and between Plaintiff, Switch, Ltd.  
23 ("PLAINTIFF") and Defendants Stephen Fairfax and MTechnology ("DEFENDANTS")  
24 by and through their respective undersigned counsel as follows:

25 1. The aforesaid parties are currently engaged in good-faith  
26 settlement negotiations.

27 2. Further, the parties are currently in the process of engaging in  
informal discovery to attempt to resolve this lawsuit, have chosen an e-discovery  
provider for the purposes of engaging in informal discovery, and are currently in  
final negotiations regarding the parameters of informal discovery.

1           3. In the meantime, to facilitate informal discovery and potential  
2 settlement and to minimize attorneys' fees and other legal expenses, the parties  
3 believe that the present civil action should be stayed, including a stay on  
4 subsequent deadlines.

5           4. Therefore, the parties agree that the Court may enter the following  
6 order and request that the Court do so accordingly:

7               a. Except as otherwise provided below, this action shall be  
8 stayed for a period of 120 days from the date this stipulation is filed with the Court,  
9 or Friday, May 24, 2019;

10              b. The stay shall immediately terminate at midnight on Friday,  
11 May 24, 2019; and

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c. The parties stipulate that nothing in this delay shall be deemed to prejudice either party.

**IT IS SO STIPULATED.**

Dated this 28<sup>th</sup> day of January 2019.

RANDAZZA LEGAL GROUP, PLLC  
/s/Ronald D. Green  
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*Attorney for Plaintiff,  
Switch, Ltd*

IT IS SO ORDERED.

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

DATED: \_\_\_\_\_